

United States Government

Department of Energy
Bonneville Power Administration

memorandum

DATE: October 23, 2003

REPLY TO
ATTN OF: KEP-4

SUBJECT: Supplement Analysis for the Transmission System Vegetation Management Program FEIS
(DOE/EIS-0285/SA-185-Naselle-Tarlet No. 1&2)

TO: Jim Jellison - TFO/Olympia
Natural Resource Specialist

Proposed Action: Vegetation Management for the Naselle-Tarlet No. 1&2 115 kV transmission lines.

Location: Project location is in the BPA Olympia Region in Pacific County, Washington.

Proposed by: Bonneville Power Administration (BPA).

Description of the Proposal: BPA proposes to clear targeted vegetation within the Right-of-Way, along access roads and around towers that may impede the operation and maintenance of the subject transmission lines. See Section 1.4 of the attached checklists for a complete description of the proposed action.

Analysis: Please see the attached checklist for the resources present. Applicable findings and mitigation measures are discussed below.

Planning Steps:

1. Identify facility and the vegetation management need.

Work will take place along the Naselle-Tarlet No. 1&2 115 kV transmission lines. The project area includes the BPA right-of-way along these lines from the Naselle to Tarlet substations. Easement widths vary from 50 to 200 feet along the ROW. The ROW is located in Pacific County, Washington in the BPA Olympia Region.

Tall growing vegetation of the types listed in Section 1.2 of the attached checklist are present in the ROW and will soon pose a hazard to the lines. Project involves clearing tall growing vegetation and treatment of the associated stumps and re-sprouts with approved herbicides to ensure that the roots are killed. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species.

Cut-stump or follow-up spot herbicide treatments on species that re-sprout will be carried out to ensure that the roots are killed (follow-up treatment may take place during the next growing season). Herbicides will not be applied using high volume methods to ensure that non-target species are not treated. Every 3 to 4 years, a maintenance contract will be necessary to treat sprouts. The use of herbicides on the initial and subsequent cycles should reduce the quantity and cost of work.

2. *Identify surrounding land use and landowners/managers and any mitigation.*

Landowners within the project area consists of rural residential, the State of Washington, the City of Long Beach, and private timber managed lands.

Letters will be sent to the property owners about 2-4 weeks prior to cutting the brush. Door to door contact will be made where it is warranted.

Tony Johnson of the Chinook Nation was contacted regarding the presence of cultural sites along the ROW. No known sites were identified.

3. *Identify natural resources and any mitigation.*

Section 3 of the attached checklist identifies the natural resources present in the area of the proposed work. The following cites resources found along with applicable mitigation measures:

Riparian Habitat:

Includes all wetlands, streams, creeks and ponds meeting the definition of riparian habitat. Riparian areas were identified which may include essential fish habitat. See Section 3.1 of the attached checklist for a complete listing of identified water resources.

Riparian Habitat Mitigation:

- Spot treat with approved practically non-toxic to slightly toxic herbicide up to waters edge of wetlands.
- No mechanical equipment will be used within 35 feet of wetlands.
- On slopes less than 20% no ground disturbing mechanical equipment will be used within 35 feet of the stream or wetland. On slopes greater than 20% no ground disturbing mechanical equipment will be used within the buffer.

T & E Species:

Section 3.3 of the attached checklist presents any Threatened or Endangered Species identified in the area of the proposed work. The ROW crosses streams containing listed anadromous fish and/or their essential habitat. By following the mitigation measures listed below, the proposed work will have no effect on listed anadromous fish or their essential habitat.

T & E Species Mitigation:

- No herbicides will be used within a 100-foot buffer of the waters edge on both sides. Only practically non-toxic to slightly toxic herbicides will be used for stump and/or foliar application between 100 to 200 feet from the waters edge on both sides.
- On slopes less than 20%, there will be no mechanical disturbance within 35 feet of the stream or water source. On slop greater than 20%, there will be no disturbance within the buffer.
- Trees inside the buffer will only be cut if within 50 feet of transmission line at max sag. Shrubs will not be cut unless over 10 feet high or within 50 feet of transmission line at max sag.

Cultural Resources:

There are no known Cultural Resources within the project area. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the local tribe will be contacted as well as the BPA Environmental Specialist.

4. *Determine vegetation control and debris disposal methods.*

Vegetation will be removed using manual, mechanical, and chemical methods. For non-sensitive areas, vegetation may be controlled by cut stump/basal treatment with 25% Garlon 4 and 75% Forest Crop Oil (FCO). A 50/50 mixture of Accord or Garlon 3A/Water may be used for stump treatment in non-T&E listed riparian zones. No herbicides will be used within a 100-foot buffer of a T&E stream.

5. *Determine revegetation methods, if necessary.*

Native grasses are present on the entire right-of-way that will seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads. BPA expects 2-3 vehicles will be present on the site. A brush machine will mulch the structure sites and right-of-way roads where scotch broom and black berries are present.

6. *Determine monitoring needs.*

Monitoring of the success of the brush-cutting program will begin the following spring, at which time an evaluation of the soil erosion as a result of the brush-cutting program will be made. If grass seeding is necessary, native grass seed will be applied.

7. Prepare appropriate environmental documentation.

Findings: This Supplement Analysis finds that 1) the proposed actions are substantially consistent with the Transmission System Vegetation Management Program FEIS (DOE/EIS-0285) and ROD, and; 2) there are no new circumstances or information relevant to environmental concerns and bearing on the proposed actions or their impacts. This Supplement Analysis also finds the proposed actions will have no effect on threatened or endangered species. Therefore, no further NEPA or ESA documentation is required.

/s/ Aaron Shurtliff

Aaron Shurtliff
Physical Scientist

/s/ Thomas C. McKinney

Thomas C. McKinney
NEPA Compliance Officer

DATE: 10/27/03

Attachment

cc:

L. Croff - KEC-4
T. McKinney - KEC-4
J. Meyer - KEP-4
J. Sharpe - KEPR-4
G. Tippetts – KEPR/ Olympia
P. Key - LC-7
K. Rodd - TF/DOB-1
J. Hilliard Creecy - T-DITT2
D. Krauss - TFO/Olympia
S. Martin – TFO/ Olympia
A. Campbell – TFOB- Olympia
G. Westling – TFOF/ Olympia
Environ. File - KEC-4
Official File - KEP (EQ-14)

Vegetation Management Checklist

1. IDENTIFY FACILITY AND THE VEGETATION MANAGEMENT NEED

1.1 Describe Right-of-way.

See Handbook — List of Right-of-way Components for checkboxes and the requirements for the components Rights-of-way, Access Roads, Switch Platforms, Danger Trees, and Microwave Beam paths.

Corridor Name	Corridor Length & kV	Easement width	Miles of Treatment
Naselle-Tarlet No. 1 & Naselle-Tarlet No. 2	18 mi., 115Kv	170, variable	18 mi.

Right Of Way:

Right-of-Way – clearing in right-of-way

A combination of mulching the easement because of the scotch broom and the cut, lop and scatter of tall growing species will be utilized to treat hazardous vegetation and this will be followed up with a herbicide treatment.

Transmission Structures – clearing around

All structures will be cut to 30 feet from the center of the pole or to the edge of the easement and the stumps will be treated with herbicide.

Access Road clearing - approximate miles – 3.6 miles

All access roads will be either C, L&S, mulched or chipped due to the encroachment of Scotch broom, blackberries, low and tall growing brush and trees then either stump or foliar chemical treatment will be applied.

1.2 Describe the vegetation needing management.

See handbook — [List of Vegetation Types](#), [Density](#), [Noxious Weeds](#) for checkboxes and requirements.

Vegetation Types

Douglas Fir	True Fir	Hemlock
Alder	Maple	Willows
Cottonwood	Wild Cherry	Blackberries
Noxious Weeds-Scotch Broom & Gorst		

1.3 List measures you will take to help promote low-growing plant communities. If promoting low-growing plants is not appropriate for this project, explain why. See Handbook — for requirements and checkboxes.

Cut stump or follow-up herbicide treatments on sprouting-types species will be carried out to ensure that the roots are killed. Vegetation that will grow tall will be selectively eliminated before it reaches a height or density to begin competing with low-growing species.

1.4 Describe overall management scheme/schedule.

See Handbook - [Overall Management Scheme/Schedule](#).

Initial entry – All tall growing vegetation will be cut and chemically treat the stumps to prevent grow-in trees. Access, right-of-way roads and structure sites are to be cut and treated.

Subsequent entries – A follow-up chemical treatment to begin in the late spring or early summer of 2004.

Future cycles – Every 3-4 years, a maintenance contract will be necessary to treat sprouts. The use of herbicides on the initial and subsequent cycles should reduce the quantity and cost of work.

2. IDENTIFY SURROUNDING LAND USE AND LANDOWNERS/MANAGERS

2.1 List the types of landowners and land uses along your corridor.

See Handbook — [Landowners/Managers/Uses](#) for requirements, and [List of Landowners/Managers/Uses](#) for a checkbox list.

Landowners/Managers/Uses:

Rural Residential Property

City of Long Beach

Private Timber Managed Lands by Weyerhaeuser, Cavenhan

State of Washington

2.2 Describe method for notifying right-of-way landowners and requesting information (i.e., door hanger, letter, phone call, e-mail, and/or meeting). Develop landowner mail list, if appropriate.

See Handbook — [Methods for Notification and Requesting Information](#) for requirements.

Olympia Region will send letters to the property owners about 2-4 weeks prior to cutting the brush. Door to door contact will be made where it is warranted.

2.3 List the specific land owner/land use measures — determined from the handbook or through your consultations with the entities — that will be applied.

See handbook — [Requirements and Guidance for Various Landowners/Uses](#) for requirements and guidance, also [Residential/Commercial](#), [Agricultural](#), [Tribal Reservations](#), [FS-managed lands](#), [BLM – managed lands](#), [Other federal lands](#), [State/ Local Lands](#).

Span		Landowner/use	Specific measures to be applied
From	To		
9/3 +75	9/4		Gravel Pit
12/6 +500	13/1	US Fish & Wildlife Service	Foot and Horse Trails
15/2 #2 line	15/15	City of Long Beach	Watershed

2.4 Review any existing landowner agreements (e.g. tree/brush Permits or Agreements). List in table above any provisions that need to be followed and where they are located.

See handbook — [Landowner Agreements](#) for requirements.

N/A

2.5 List any known casual informal use of the right-of-way by non-owner publics. List any constraints or measure's to take due to the informal use.

See handbook — [Casual Informal Use of Right-of-way](#) for requirements.

N/A

2.6 List other potentially affected people, agencies, or tribes (that are not landowners/managers) that need to be notified or coordinated with. Describe method of notification and coordination.

See handbook — [Other Potentially Affected Publics](#) for requirements and suggestions.

I have contacted Tony Johnson, Cultural Resource Specialist of the Chinook Tribe regarding his knowledge of any cultural sites on the Naselle-Tarlet easement. They are not aware of any cultural sites.

3. IDENTIFY NATURAL RESOURCES

See Handbook — [Natural Resources](#)

3.1 List any water resources (streams, rivers, lakes, wetlands) that may be impacted by vegetation control activities. For each water body describe the control methods and requirements or mitigation measures that will be used.

See Handbook — [Water Resources](#) for requirements for working near water resources including buffer zones.

Span		Water body	T&E	Method	Herbicide	Application Technique	Buffer	Other
From	To							
1/2 +65	135	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/4 +65	135	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/5 +0	250	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/8 +465	535	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/9+65	135	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/10 + 265	335	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
1/11 + 515	585	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting

2/5 +400	651	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
2/9+ 0	721	Naselle River	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting
3/1+115	185	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
3/4+300	700	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
3/5 +0	3/8 +	Wetlands	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
3/9 + 0	792	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
4/2+400	500	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
4/9 +150	350	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
5/3+ 435	600	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
6/6+400	470	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
6/7 +0	1400	Ellsworth Slough	Yes	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting
7/5+ 265	335	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
9/2 +250	500	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
9/4 +315	385	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
9/6+ 465	535	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/4+65	135	No name creek-int	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/5 + 295	365	No name creek-int	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/6 + 395	465	No name creek-int	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/7+435	505	No name creek-int	No	Cut Stump	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting

10/8 + 275	748	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/9+165	235	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/9 + 615	685	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
10/8+ 100 #2 line	150	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
11/1 + 265 #2 line	335	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
11/2+765	835	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
11/3+ 300	370	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
11/4+ 0	11/5 +625	Greenhead Slough	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
11/6+ 200	400	Slough	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
12/1+ 300	12/7 +400	Slough	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
13/2+200	1000	Slough	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
13/6+ 600	700	Wetlands	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
13/7 +25	365	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
14/7+ 150	220	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
15/6+ 100	500	Wetlands.	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
16/9 + 35	105	No name creek	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
N-T#2 line								
12/5 +0	12/7 +650	Wetlands	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
12/8+100	13/2 + 640	Wetlands	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
13/3 + 0	375	Bear River	Yes	Skip	Garlon 3A	Spot Treat 100-200'	100'	Selective Cutting
13/4 + 0	150	Wtlds.	No	Skip	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting

14/3 + 450	1025	Wtlds& no name ck.	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
14/6 + 365	435	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
14/8 + 135	550	3 No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
15/5+ 200	260	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
15/6+ 65	135	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
15/6+ 200	270	No name creek	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting
15/9+ 150	650	No name creek & Reservoir	No	Cut Stump	Garlon 3A	Spot Treat w/in buffer	Waters edge	Selective Cutting

3.2 If planning to use herbicides, list locations of any known irrigation source, wells, or springs (landowners maybe able to provide this info if requested).

See Handbook — [Herbicide Use Near Irrigation, Wells or Springs](#) for buffers and herbicide restrictions.

Span		Well/irrigation/or spring	Herbicide	Other notes/measures
To	From			
15/2 N- T#2	15/15	Long Beach Watershed	No herbicide	C, L&S

3.3 List below the areas that have Threatened or Endangered Plant or Animal Species and the name of the species, and any special measures that need to be taken due to their presence. Attach any BAs, T&E maps, or letters from US Fish and Wildlife.

See Handbook — [T&E Plant or Animal Species](#) for requirements and determining presence.

Span		T&E Species & EFH	Method/mitigation or avoidance measures
From	To		
2/9+0	2/9+721	Anadromous Salmon	Selective cutting of trees only in riparian zone and/or cutting trees tops that are within 50' of the conductor at max sag. Shrubs will not be cut that are less than 10' high or where the ground to conductor clearance is less than 50' at max sag. No herbicide treatment within 100' of stream bank. 100-200' from the stream bank, chemical treatment of the stumps and/or foliar application with Garlon 3A.

4/2	5/2	Marbled Murrelet	Seasonal restrictions from 3/1/04 to 8/24/04, no chainsaw cutting activity. In addition, modified seasonal restriction from 8/24 to 9/15/03, there will be no chainsaw activity within 2 hours after sunrise and within 2 hours before sunset.
6/7+0	6/7+1400	Anadromous Salmon	Same treatment as noted in 2/9+0 to 2/9+721.
12/4+0	12/7+475	Anadromous Salmon	Same treatment as noted in 2/9+ 0 to 721.
13/3+0 N-T#2	13/4+375	Anadromous Salmon	Same treatment as noted in 2/9+ 0 to 721.
15/2 N-T#2	15/10	Marbled Murrelet	Seasonal restrictions from 3/1/04 to 8/24/04, no chainsaw cutting activity. In addition, modified seasonal restriction from 8/24 to 9/15/03, there will be no chainsaw activity within 2 hours after sunrise and within 2 hours before sunset.

3.4 List any other measures to be taken for enhancing wildlife habitat or protecting species.

See Handbook — [Protecting Other Species](#) for requirements.

N/A

3.5 List any visually sensitive areas and the measures to be taken at these areas.

See Handbook — [Visual Sensitive Areas](#) for requirements.

N/A

3.6 List areas with cultural resources and the measures to be taken in those areas.

See Handbook – [Cultural Resources](#) for requirements.

Span		Describe sensitivity	Method/mitigation measures
From	To		
1/1	17/9	Cultural Sites	The Chinook Tribes do not know of any cultural sites on this transmission corridor. If a site is discovered during the course of vegetation control, work will be stopped in the vicinity and the local tribe will be contacted as well as the BPA Environmental Specialist.

3.7 List areas with steep slopes or potential erosion areas and the measure and methods to be applied in those areas.

See Handbook – [Steep/Unstable Slopes](#) for requirements.

N/A

3.8 List areas of spanned canyons and the type of cutting needed.

See Handbook – [Spanned Canyons](#) for requirements.

N/A

4. DETERMINE VEGETATION CONTROL METHODS

See Handbook — [Methods](#)

4.1 List Methods that will be used in areas not previously addressed in steps above.

See Handbook — [Manual](#), [Mechanical](#), [Biological](#), and [Herbicides](#) for requirements for each of the methods.

Span		Methods, including herbicide active ingredient, trade name, application technique
To	From	
1/1	17/9	For non-sensitive areas (spans) cut stump/basal treatment with 25% Garlon 4 and 75% Forest Crop Oil (FCO). 50/50 Accord or Garlon 3A/Water for stump treatment in the non T&E listed creek riparian zones and 100' buffer on no herbicide treatment for T&E listed creek. A late and early summer follow-up foliar treatment with Garlon 3A and Escort on sprouting stumps and/or brush. Initially, foliar treat Scotch broom and Gorst as well as a follow up treatment in the spring-summer.

5. DETERMINE DEBRIS DISPOSAL AND REVEGETATION

5.1 Describe the debris disposal methods to be used and any special considerations.

See Handbook — [Debris disposal](#) for a checkbox list and requirements.

Debris Disposal:

Chip (Mechanical brush disposal unit cuts brush into chips 4 in. or less in diameter, and spread over ROW, piled on ROW, or trucked off site. Trunks too large for the chipper are limbed and the limbs chipped. Trunks are placed in rows along the edge of the right-of-way or scattered, as the situation requires.)

Lop and Scatter (Branches of a fallen tree are cut off (lopped) by ax or chainsaw, so the tree trunk lies flat on the ground. The trunks are occasionally cut in 1-to-2-m (4-to-8-ft.) lengths. The cut branches and trunks are then scattered on the ground, laid flat, and left to decompose.)

Mulch (Mulching is a debris treatment that falls between chipping and lop-and-scatter. The debris is cut into 1-to-2-ft. lengths, scattered on the right-of-way and left to decompose. This method is used when terrain and conditions do not allow the use of mechanical chipping equipment.)

5.2 List areas of reseeding or replanting (those areas not already described in steps 1, 2, or 3).

See Handbook — [Reseeding/replanting](#) for requirements.

Native grasses are present on the entire right-of-way that will seed into the areas that will have lightly disturbed soil predominately located on the right-of-way roads. BPA expects 2-3 vehicles of the brush contractor and 1 contract inspector's vehicle will be present on the site. A brush machine will mulch the structure sites and right-of-way roads where Scotch Broom and Black Berries are present.

5.3 If not using native seed/plants, describe why.

N/A

5.4 Describe timing and any follow-up that will need to take place to ensure germination/success of seeding/planting.

Monitoring of the success of the brush-cutting program will begin the spring in which evaluation of soil erosion as a result of the brush-cutting program will be made. If grass seeding is necessary, native grass seed will be applied.

6. DETERMINE MONITORING NEEDS

See handbook — [Monitoring](#) for requirements.

6.1 Describe the follow-up/monitoring cycle that will be used to evaluate the effectiveness of the vegetation control methods used.

Monitoring of the effectiveness of the herbicide treatment will begin in the spring and follow up treatment of cut stump/basal or foliar treatment of target vegetation. The mixture of the product is 25% Garlon 4 and 75% FCO for stump treatment or 97% water, 3% Garlon 3A with 2 oz./ ac. of Escort for foliar treatment. Depo-RTU will be utilized to reduce drift when necessary.

6.2 Describe any follow-up or monitoring needed to determine if mitigation measures were effective.

Annually patrol the transmission line by the line crew and the Natural Resource Specialist will periodically monitor the right-of-way for effective mitigation measures.

7. PREPARE APPROPRIATE ENVIRONMENTAL DOCUMENTATION

See handbook — [Prepare Appropriate Environmental Documentation](#) for requirements. . Also prepare Supplement Analysis — [Supplement Analysis](#) — for signature.

7.1 Describe any potential project impacts or project work that are different than those disclosed in the Transmission System Vegetation Management Program EIS. Describe how those differences impact natural resources and if the differences are “substantial”.

All proposed brush cutting and chemical treatment activities on this corridor is noted in the EIS.

7.2 Is there a need for additional NEPA documentation (i.e. Forest Service requirement, Record of Decision, supplemental EIS)? If so, attach.

No